

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In Re: BAIR HUGGER FORCED AIR WARMING PRODUCTS LIABILITY LITIGATION	MDL No. 15-2666 (JNE/DTS)
This Document Relates to All Actions	

**DECLARATION OF GENEVIEVE M. ZIMMERMAN**

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbeshier & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter. I submit this declaration in support of Plaintiffs' Response Opposing Defendants' Rule 37 Motion to Bar Plaintiffs' Experts.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Mistral-Air User Manual.
3. Attached hereto as Exhibit 2 is a true and correct copy of the model 200 Bair Hugger label warning the risk of airborne contamination.
4. Attached hereto as Exhibit 3 is a true and correct copy of 3M internal document bearing bates range 3MBH00982867-85.
5. Attached hereto as Exhibit 4 is a true and correct copy of 3M internal document bearing bates range 3MBH00001389-90.
6. Attached hereto as Exhibit 5 is a true and correct copy of 3M internal document bearing bates range 3M00554405.
7. Attached hereto as Exhibit 6 is a true and correct copy of 3M internal document bearing bates range 3MBH01726344.
8. Attached hereto as Exhibit 7 is a true and correct copy of 3M internal document bearing bates range 3M00639100-06.
9. Attached hereto as Exhibit 8 is a true and correct copy of Albert Van Duren's power point on Disruptive Technology in Patient Warming, February, 2016.

Dated: September 4, 2018

MESHBESHER & SPENCE LTD.

/s/ Genevieve M. Zimmerman

Genevieve M. Zimmerman (MN #330292)

1616 Park Avenue South

Minneapolis, MN 55404

Phone: (612) 339-9121

Fax: (612) 339-9188

Email: gzimmerman@meshbeshher.com

**Plaintiffs Co-Lead Counsel**